

CAUSE NO. DC-22-02900**DORENNA BROWN,**  
*Plaintiff,*§  
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§**IN THE DISTRICT COURT**

v.

**DALLAS COUNTY, TEXAS****WALMART STORES, INC.,**  
**WAL-MART STORES TEXAS, LLC,**  
**WAL-MART STORES EAST, LP,**  
**WAL-MART STORES EAST INC.**  
*Defendants.*

116th

       **JUDICIAL DISTRICT**

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**PLAINTIFF'S ORIGINAL PETITION**

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**TO THE HONORABLE JUDGE OF SAID COURT:**

COMES NOW, Dorenn Brown ("Plaintiff") complaining of and against Walmart Stores, Inc., Wal-Mart Stores Texas, LLC, Wal-Mart Stores East, LP, and Wal-Mart Stores East Inc. ("Defendants") and would respectfully show unto the Court as follows:

**I. DISCOVERY CONTROL PLAN**

Plaintiff intends to conduct discovery under Level 2 of Texas Rule of Civil Procedure 190.3. Pursuant to Texas Rule of Civil Procedure §194.2, Defendants' Initial Disclosures are required to be made within thirty (30) days after the filing of the first answer, unless a different time is set by the Court or by the parties' agreement.

**II. PARTIES AND SERVICE**

1. Plaintiff is an individual residing in Dallas County, Texas and the last three digits of her driver's license number are 661.

2. Defendant Walmart Stores, Inc. ("Defendant Walmart") is a corporation doing business in the state of Texas. Defendant Walmart may be served through its registered agent, C T

Corporation System, located at 1999 Bryan Street, Suite 900, Dallas, Dallas County, Texas 75201, or wherever it may be found.

3. Defendant Wal-Mart Stores Texas, LLC (“Defendant Stores Texas”) is a limited liability company doing business in the state of Texas. Defendant Stores Texas may be served through its registered agent, C T Corporation System, located at 1999 Bryan Street, Suite 900, Dallas, Dallas County, Texas 75201, or wherever it may be found.

4. Defendant Wal-Mart Stores East, LP (“Defendant Stores East, LP”), is as limited partnership doing business in the state of Texas. Defendant Stores East, LP may be served through its registered agent, C T Corporation System, located at 1999 Bryan Street, Suite 900, Dallas, Dallas County, Texas 75201, or wherever it may be found.

5. Defendant Walmart Stores East Inc. (“Defendant Stores East Inc.”) is a corporation doing business in the state of Texas. Defendant Stores East Inc. may be served through its registered agent, Corporation Service Company, located at 800 Brazos Street, Suite 750, Austin, Texas 78701-2554, or wherever it may be found.

### III. JURISDICTION

6. This Court has jurisdiction as Plaintiff’s damages exceed the minimum jurisdictional limits of this Court.

### IV. VENUE

7. Venue is proper in Dallas County, Texas, pursuant to 15.002(a)(1) of the Texas Civil Practice and Remedies Code, because all or a substantial part of the events or omissions giving rise to the claimed occurred in Dallas County. Additionally, Defendants maintained its premises that is the subject of this suit in Dallas County.

## V. FACTS

8. On or about July 1, 2020, Plaintiff was a customer at Defendants' store located at 6185 Retail Road, Dallas, Texas 75231.

9. Defendants were the owners and/or shopkeepers operating a supermarket at the premises located at 6185 Retail Road, Dallas, Texas 75231.

10. Plaintiff entered the Defendants' premises in response to the Defendants' invitation and for Plaintiff's and Defendants' mutual benefit.

11. Specifically, Plaintiff entered Defendants' premises as a business patron to make purchases at the Defendants' premises.

12. Plaintiff was, at all times, an invitee on Defendants' premises.

13. While walking along the pathway to enter the store, Plaintiff's right foot got caught on a piece of metal that was sticking up out of the concrete. Plaintiff tripped and fell left into a metal temporary fence that was in front of the entrance. Plaintiff's left arm became caught in the temporary fence as she was falling.

14. Dallas Police Officers were sitting in their vehicle, saw Plaintiff fall, and went to assist her. The police officers placed a trash can over the protruding piece of metal.

15. The immense force of Plaintiff's fall caused severe and critical injuries, including but not limited to, fractured left scapula, left shoulder pain, upper back pain, aching pain and soreness in the left arm, soreness in her bilateral knees, with more aggravated pain in the right knee, along with occasional numbness in the toes.

16. As a direct result of the injuries that Plaintiff sustained, Plaintiff has been unable to work. Plaintiff has lost wages and her earning capacity will continue to be so impaired well into the future.

17. Defendants failed to ensure that the area was safe and free of dangerous conditions for patrons to enter their premises.

18. Defendants had a duty to protect patrons from dangerous conditions arising from the Defendants' control over the premises. This duty includes duty to inspect and duty to warn or make conditions safe.

19. Defendants failed to exercise ordinary care and breached its duty to protect the Plaintiff from dangerous conditions by allowing metal to protrude from the designated walkway area, where patrons reasonably and regularly travel to enter the store. Defendants created an unreasonable risk of harm to Plaintiff by failing to warn Plaintiff of such risk, by failing to make such conditions safe, and by failing to take proper precautions to prevent foreseeable harm.

20. In the alternative, Plaintiff's injury was the result of the Defendants negligence in: failing to develop and implement adequate policies and procedures for the maintenance of its equipment; failing to ensure that its agents and/or employees were aware of potential dangers to store patrons and that such employees followed proper policies and procedures for patron safety; failing to train agents and/or employees with regards to inspecting equipment; failing to properly maintain and repair equipment; and failing to warn Plaintiff of the protruding metal and/or remove the protruding metal from the premises.

21. It was the Defendants negligence and gross negligence that was the proximate cause and/or one of the proximate causes of Plaintiff's personal injuries and damages. Plaintiff seeks recovery of those damages from Defendant Walmart and Defendant Stores Texas jointly and severally.

**VI. PREMISES LIABILITY OF DEFENDANTS WALMART STORES, INC.,  
WAL-MART STORES TEXAS, LLC., WAL-MART STORES EAST, LP, AND  
WAL-MART STORES EAST, INC.**

22. Plaintiff fully incorporates herein for all purposes the foregoing facts set out in *Plaintiff's Original Petition*.

23. Plaintiff was an invitee at the time of the injury, and Defendants, collectively, owed Plaintiff a duty to exercise ordinary care to keep the premises in a reasonably safe condition, inspect the premises to discover latent defects, and to make safe any defects, or give adequate warnings of any dangers.

24. The conduct of Defendants, collectively, and its agents was one of the proximate causes, or the proximate cause, of Plaintiff's personal injuries and damages.

25. Defendants, collectively, knew or should have known that the condition on its premises created an unreasonable risk of harm to invitees, such as Plaintiff.

26. Defendants, collectively, breached their duty of ordinary care owed to Plaintiff, in that Defendants' premises posed an unreasonable risk of harm to Plaintiff, in the following acts, to wit:

- a. Failing to provide a safe path for patrons within Defendants' premises;
  - b. Failing to inspect the premises on a routine basis;
  - c. Failing to properly maintain the designated walkway for use by patrons;
  - d. Failing to properly instruct, educate, or train its employees and agents to maintain a hazard free environment;
  - e. Failing to supervise its employees and agents to ensure the safety of invitees; and
  - f. Failing to warn Plaintiff of such an unreasonable risk of harm.
27. Plaintiff seeks recovery of those damages from Defendants jointly and severally.
28. Defendants failed to act with ordinary prudence as a party would have acted under the same or similar circumstances.

29. The conduct of Defendants was a substantial factor in bringing about Plaintiff's injuries and without such cause, Plaintiff's injuries and damages would not have occurred.

30. As the conduct of Defendants as the proximate cause and/or one of the proximate causes of Plaintiff's personal injuries and damages, the Defendants acts and/or omissions constituted negligence and gross negligence, to wit:

- a. failing to develop and implement adequate policies and procedures for proper maintenance of the premises;
- b. failing to ensure that its agents and/or employees were aware of potential dangers to patrons and that such employees followed proper policies and procedures for patron safety;
- c. failing to train agents and/or employees with regards to inspecting the premises regularly as to avoid unreasonable and foreseeable risks to patrons; and
- d. failing to properly maintain the designated walkway for use by patrons.

31. Each of the above acts or omissions constitutes negligence and/or gross negligence, which proximately caused the occurrence made the basis of this action and the proximate cause of Plaintiff's damages.

32. Plaintiff seeks recovery of those damages from Defendants jointly and severally.

### **VIII. DAMAGES**

33. As a result of the Defendants' failure to exercise ordinary care to protect Plaintiff from unreasonably dangerous conditions in the Defendants' premises and the Defendants' failure to adequately warn Plaintiff of the protruding metal in the designated walkway, and failure to make such condition reasonably safe, Plaintiff suffered serious injuries to her body.

34. As a result of the injuries that Plaintiff sustained, she incurred reasonable and

necessary doctors' and medical expenses for her necessary medical care and attention in excess of the jurisdictional limits of this court. There is also a reasonable probability that Plaintiff will incur additional expenses for necessary medical and related health care in the future in an amount unknown at this time.

35. In addition, Plaintiff suffered severe physical and mental pain, suffering and anguish, disfigurement, and lost wages. In all reasonable probability, Plaintiff will continue to suffer in this manner and her earning capacity will continue to be so impaired well into the future, if not for the balance of her natural life.

36. As a proximate result of the Defendants negligence, Plaintiff suffered injuries to her body in general. Defendants aforementioned negligence diminished Plaintiff's ability to administer to her own needs. It is more likely than not that Plaintiff's ability to attend to customary household duties and earning capacity will be impaired well into the future, if not for the balance of her natural life.

#### **IX. RULE 47 PLEADING**

37. Plaintiff pleads, as she is required to under Rule 47(c)(3) of the Texas Rules of Civil Procedure, that he seeks monetary relief over \$250,000 but not more than \$1,000,000.

#### **X. RULE 193.7 SELF-AUTHENTICATION**

38. Plaintiff hereby provides notice to Defendants that any documents produced in response to written discovery will be authenticated for use in any pre-trial proceeding or at trial.

#### **XI. DESIGNATED E-SERVICE ADDRESS**

39. The under-signed attorney's designated e-service address for all e-served documents and notices, filed and unfiled is: **efile@chalakilaw.com**. This is the under-signed attorney's only e-service email address, and service through any other email address will be considered invalid.

## **XII. PRAYER**

40. **WHEREFORE**, Plaintiff respectfully request that Defendants be cited to appear and answer, and that on final trial, Plaintiff be awarded judgment against Defendants for the following:

- a. Actual medical bills for Plaintiff's damages, which are necessary and reasonable for these types of services; and for future medical attention, and full damages in a sum within the jurisdictional limits of this Court;
- b. Monetary damages for past and future physical pain and suffering and mental anguish found to be reasonable and just by the trier of fact;
- c. Lost wages;
- d. Monetary damages for disfigurement found to be reasonable and just by the trier of fact;
- e. Physical and wage impairment as determined by the trier of fact;
- f. Pre and post judgment interest at the maximum legal rate;
- g. Costs of Court; and
- h. Such other and further relief, at law or in equity, to which Plaintiff will be justly entitled.



Respectfully submitted,

CHALAKI LAW, P.C.

By: /s/ Shawn Hashemi

E-service: [efile@chalakilaw.com](mailto:efile@chalakilaw.com)

**Shawn Hashemi**

Texas Bar No. 24090151

**North Dallas Law Center**

3234 Commander Drive, Suite 100

Carrollton, Texas 75006

Tel. (972) 793-8500

Fax. (800) 991-6288

ATTORNEY FOR PLAINTIFF

**FORM NO. 353-3 - CITATION  
THE STATE OF TEXAS**

**To: WAL-MART STORES TEXAS, LLC  
BY SERVING ITS REGISTERED AGENT C T CORPORATION SYSTEM  
1999 BRYAN ST., STE. 900  
DALLAS, TX 75201**

**GREETINGS:**

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **116th District Court** at 600 Commerce Street, Ste. 101, Dallas, Texas 75202.

Said Plaintiff being **DORENNA BROWN**

Filed in said Court **15th day of March, 2022** against

**WALMART STORES, INC., WAL-MART STORES TEXAS, LLC, WAL-MART STORES EAST, LP AND WAL-MART STORES EAST INC.**

For Suit, said suit being numbered **DC-22-02900**, the nature of which demand is as follows:  
Suit on **PROPERTY** etc. as shown on said petition **REQUEST FOR DISCLOSURE**, a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.  
Given under my hand and the Seal of said Court at office this 31st day of March, 2022.

ATTEST: FELICIA PITRE, Clerk of the District Courts of Dallas, County, Texas

By *Carlenia Bouligny*, Deputy  
CARLENIA BOULIGNY



**ESERVE**

**CITATION**

**DC-22-02900**

**DORENNA BROWN**

**vs.**

**WALMART STORES INC, et al**

**ISSUED THIS  
31st day of March, 2022**

**FELICIA PITRE**  
Clerk District Courts,  
Dallas County, Texas

By: CARLENIA BOULIGNY, Deputy

**Attorney for Plaintiff**  
**SHAWN S HASHEMI**  
CHALAKI LAW PC  
3234 COMMANDER DR  
STE 100  
CARROLLTON TX 75006  
972-793-8500  
**efile@chalakilaw.com**

**DALLAS COUNTY  
SERVICE FEES  
NOT PAID**

## OFFICER'S RETURN

Case No. : DC-22-02900

Court No.116th District Court

Style: DORENNA BROWN

vs.

WALMART STORES INC, et al

Came to hand on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_, at \_\_\_\_\_ o'clock \_\_\_\_\_ .M. Executed at \_\_\_\_\_, within the County of \_\_\_\_\_ at \_\_\_\_\_ o'clock \_\_\_\_\_ .M. on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_, by delivering to the within named \_\_\_\_\_

each in person, a true copy of this Citation together with the accompanying copy of this pleading, having first endorsed on same date of delivery.

The distance actually traveled by me in serving such process was \_\_\_\_\_ miles and my fees are as follows: To certify which witness my hand.

For serving Citation	\$ _____	_____
For mileage	\$ _____	of _____ County, _____
For Notary	\$ _____	By _____ Deputy

(Must be verified if served outside the State of Texas.)

Signed and sworn to by the said \_\_\_\_\_ before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_, to certify which witness my hand and seal of office.

\_\_\_\_\_  
Notary Public \_\_\_\_\_ County \_\_\_\_\_

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THE STATE OF TEXAS**

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1999 BRYAN ST., STE. 900  
DALLAS, TX 75201**

**GREETINGS:**

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **116th District Court** at 600 Commerce Street, Ste. 101, Dallas, Texas 75202.

Said Plaintiff being **DORENNA BROWN**

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By *Carlenia Bouligny*, Deputy  
CARLENIA BOULIGNY



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Clerk District Courts,  
Dallas County, Texas

By: CARLENIA BOULIGNY, Deputy

**Attorney for Plaintiff**  
**SHAWN S HASHEMI**  
CHALAKI LAW PC  
3234 COMMANDER DR  
STE 100  
CARROLLTON TX 75006  
972-793-8500  
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\_\_\_\_\_, within the County of \_\_\_\_\_ at \_\_\_\_\_ o'clock \_\_\_\_\_ .M. on the  
\_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_, by delivering to the within named

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For Notary	\$ _____	By _____ Deputy

(Must be verified if served outside the State of Texas.)

Signed and sworn to by the said \_\_\_\_\_ before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_,  
to certify which witness my hand and seal of office.

\_\_\_\_\_  
Notary Public \_\_\_\_\_ County \_\_\_\_\_

**FORM NO. 353-3 - CITATION  
THE STATE OF TEXAS**

**To: WALMART STORES EAST INC.  
BY SERVING ITS REGISTERED AGENT CORPORATION SERVICE COMPANY  
800 BRAZOS ST., STE. 750  
AUSTIN, TX 89801-2554**

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By *Carlenia Bouligny*, Deputy  
CARLENIA BOULIGNY



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Clerk District Courts,  
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By: CARLENIA BOULIGNY, Deputy

**Attorney for Plaintiff**  
**SHAWN S HASHEMI**  
CHALAKI LAW PC  
3234 COMMANDER DR  
STE 100  
CARROLLTON TX 75006  
972-793-8500  
**efile@chalakilaw.com**

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For Notary	\$ _____	By _____ Deputy

(Must be verified if served outside the State of Texas.)

Signed and sworn to by the said \_\_\_\_\_ before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_, to certify which witness my hand and seal of office.

\_\_\_\_\_  
Notary Public \_\_\_\_\_ County \_\_\_\_\_

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THE STATE OF TEXAS**

**To: WALMART STORES EAST INC.  
BY SERVING ITS REGISTERED AGENT CORPORATION SERVICE COMPANY  
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AUSTIN, TX 89801-2554**

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Said Plaintiff being **DORENNA BROWN**

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By *Carlenia Bouligny*, Deputy  
CARLENIA BOULIGNY



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Dallas County, Texas**

By: CARLENIA BOULIGNY, Deputy

**Attorney for Plaintiff  
SHAWN S HASHEMI  
CHALAKI LAW PC  
3234 COMMANDER DR  
STE 100**

**CARROLLTON TX 75006  
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## OFFICER'S RETURN

Case No. : DC-22-02900

Court No. 116th District Court

Style: DORENNA BROWN

vs.

WALMART STORES INC, et al

Came to hand on the 31<sup>st</sup> day of March, 20 22, at 6 o'clock P.M. Executed at  
211 E. 4th Street #602, within the County of Travis at 9:35 o'clock A.M. on the  
4th day of April, 20 22, by delivering to the within named  
Walmart Stores East Inc

each ~~in person~~, a true copy of this Citation together with the accompanying copy of this pleading, having first endorsed on same date of delivery.

The distance actually traveled by me in serving such process was \_\_\_\_\_ miles and my fees are as follows: To certify which witness my hand.

For serving Citation \$ \_\_\_\_\_

For mileage \$ \_\_\_\_\_

For Notary \$ \_\_\_\_\_

of \_\_\_\_\_ County, \_\_\_\_\_  
By [Signature] Deputy

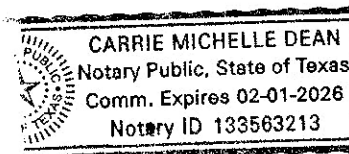
18830  
OK 10/21/22


(Must be verified if served outside the State of Texas.)

Signed and sworn to by the said Steven Frudentha before me this 18 day of February, 20 22,  
to certify which witness my hand and seal of office.

By CMRR 7021 1970000582343070

Carrie M. Dean  
Notary Public Dallas County TX



SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY																
<ul style="list-style-type: none"> <li>■ Complete items 1, 2, and 3.</li> <li>■ Print your name and address on the reverse so that we can return the card to you.</li> <li>■ Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	<p>A. Signature  <b>X</b> Viva Tejas Logistics (AAO) <input type="checkbox"/> Agent  <input type="checkbox"/> Addressee</p>																
<p>1. Article Addressed to:  Walmart Stores East Inc  CORPORATION SERVICE COMPANY</p>	<p>B. Received by (Printed Name) <b>APR 11 2022</b>  C. Date of Delivery</p>																
<p>711 E. 7th STREET, #607  AUSTIN, TEXAS 78701</p>	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes  If YES, enter delivery address below: <input type="checkbox"/> No  Carlos Mendez</p>																
<p>  9590 9402 7160 1251 2635 94</p>	<p>3. Service Type</p> <table border="0"> <tr> <td><input type="checkbox"/> Adult Signature</td> <td><input type="checkbox"/> Priority Mail Express®</td> </tr> <tr> <td><input type="checkbox"/> Adult Signature Restricted Delivery</td> <td><input type="checkbox"/> Registered Mail™</td> </tr> <tr> <td><input type="checkbox"/> Certified Mail®</td> <td><input type="checkbox"/> Registered Mail Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Certified Mail Restricted Delivery</td> <td><input type="checkbox"/> Signature Confirmation™</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery</td> <td><input type="checkbox"/> Signature Confirmation Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery Restricted Delivery</td> <td></td> </tr> <tr> <td><input type="checkbox"/> Insured Mail</td> <td></td> </tr> <tr> <td><input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</td> <td></td> </tr> </table>	<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®	<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™	<input type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery	<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Signature Confirmation™	<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery	<input type="checkbox"/> Collect on Delivery Restricted Delivery		<input type="checkbox"/> Insured Mail		<input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)	
<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®																
<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™																
<input type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery																
<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Signature Confirmation™																
<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery																
<input type="checkbox"/> Collect on Delivery Restricted Delivery																	
<input type="checkbox"/> Insured Mail																	
<input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)																	
<p>2. Article Number (Transfer from service label)  7021 1970 0000 8234 3070</p>																	

PS Form 3811, July 2020 PSN 7530-02-000-9053

Domestic Return Receipt

**Automated Certificate of eService**

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Envelope ID: 63670323

Status as of 4/20/2022 12:46 PM CST

Associated Case Party: DORENNA BROWN

Name	BarNumber	Email	TimestampSubmitted	Status
Shawn Hashemi		efile@chalakilaw.com	4/19/2022 7:57:17 AM	SENT

**FORM NO. 353-3 - CITATION  
THE STATE OF TEXAS**

**To: WAL-MART STORES EAST, LP  
BY SERVING ITS REGISTERED AGENT C T CORPORATION SYSTEM  
1999 BRYAN ST., STE. 900  
DALLAS, TX 75201**

**GREETINGS:**

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **116th District Court** at 600 Commerce Street, Ste. 101, Dallas, Texas 75202.

Said Plaintiff being **DORENNA BROWN**

Filed in said Court **15th day of March, 2022** against

**WALMART STORES, INC., WAL-MART STORES TEXAS, LLC, WAL-MART STORES EAST, LP AND WAL-MART STORES EAST INC.**

For Suit, said suit being numbered **DC-22-02900**, the nature of which demand is as follows:  
Suit on **PROPERTY** etc. as shown on said petition **REQUEST FOR DISCLOSURE**, a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.  
Given under my hand and the Seal of said Court at office this 31st day of March, 2022.

ATTEST: FELICIA PITRE, Clerk of the District Courts of Dallas, County, Texas

By *Carlenia Bouligny*, Deputy  
CARLENIA BOULIGNY



**ESERVE**

**CITATION**

**DC-22-02900**

**DORENNA BROWN**

**vs.**

**WALMART STORES INC, et al**

**ISSUED THIS**

**31st day of March, 2022**

**FELICIA PITRE**

**Clerk District Courts,**

**Dallas County, Texas**

**By: CARLENIA BOULIGNY, Deputy**

**Attorney for Plaintiff**

**SHAWN S HASHEMI**

**CHALAKI LAW PC**

**3234 COMMANDER DR**

**STE 100**

**CARROLLTON TX 75006**

**972-793-8500**

**efile@chalakilaw.com**

**DALLAS COUNTY**

**SERVICE FEES**

**NOT PAID**

## OFFICER'S RETURN

Case No. : DC-22-02900

Court No. 116th District Court

Style: DORENNA BROWN

vs.

WALMART STORES INC, et al

Came to hand on the 31st day of MARCH, 20 22, at 2:00 o'clock P.M. Executed at  
1949 BRYAN SE #900, DALLAS, TX 75201, within the County of DALLAS at 3:05 o'clock P.M. on the  
31st day of MARCH, 20 22, by delivering to the within named  
WAL-MART STORES EAST LP, B/S IT'S R/A, CT CORPORATION SYSTEMS, THROUGH  
GEORGE MARTINEZ

each in person, a true copy of this Citation together with the accompanying copy of this pleading, having first endorsed on same date of delivery.

The distance actually traveled by me in serving such process was \_\_\_\_\_ miles and my fees are as follows: To certify which witness my hand.

For serving Citation \$ \_\_\_\_\_

For mileage \$ \_\_\_\_\_

For Notary \$ \_\_\_\_\_

STEVEN L. FRIEDENTHAL 78830

of DENTON County, TX. EX 10/31/22

By [Signature] Deputy

(Must be verified if served outside the State of Texas.)

Signed and sworn to by the said STEVEN L. FRIEDENTHAL before me this 1 day of April, 20 22,  
to certify which witness my hand and seal of office.

Notary Public

Carrie M. Dean

Dallas

County Texas



**Automated Certificate of eService**

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Envelope ID: 63219259

Status as of 4/5/2022 2:13 PM CST

Associated Case Party: DORENNA BROWN

Name	BarNumber	Email	TimestampSubmitted	Status
Shawn Hashemi		efile@chalakilaw.com	4/4/2022 10:23:15 AM	SENT

**FORM NO. 353-3 - CITATION  
THE STATE OF TEXAS**

**To: WALMART STORES, INC.  
BY SERVING ITS REGISTERED AGENT C T CORPORATION SYSTEM  
1999 BRYAN ST., STE. 900  
DALLAS, TX 75201**

**GREETINGS:**

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **116th District Court** at 600 Commerce Street, Ste. 101, Dallas, Texas 75202.

Said Plaintiff being **DORENNA BROWN**

Filed in said Court **15th day of March, 2022** against

**WALMART STORES, INC., WAL-MART STORES TEXAS, LLC, WAL-MART STORES EAST, LP AND WAL-MART STORES EAST INC.**

For Suit, said suit being numbered **DC-22-02900**, the nature of which demand is as follows:  
Suit on **PROPERTY** etc. as shown on said petition **REQUEST FOR DISCLOSURE**, a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.  
Given under my hand and the Seal of said Court at office this 31st day of March, 2022.

ATTEST: FELICIA PITRE, Clerk of the District Courts of Dallas, County, Texas

By *Carlenia Bouligny*, Deputy  
CARLENIA BOULIGNY



**ESERVE**

**CITATION**

**DC-22-02900**

**DORENNA BROWN**

**vs.**

**WALMART STORES INC, et al**

**ISSUED THIS  
31st day of March, 2022**

**FELICIA PITRE  
Clerk District Courts,  
Dallas County, Texas**

By: CARLENIA BOULIGNY, Deputy

**Attorney for Plaintiff  
SHAWN S HASHEMI**

**CHALAKI LAW PC  
3234 COMMANDER DR  
STE 100**

**CARROLLTON TX 75006**

**972-793-8500**

**efile@chalakilaw.com**

**DALLAS COUNTY  
SERVICE FEES  
NOT PAID**



## OFFICER'S RETURN

Case No. : DC-22-02900

Court No. 116th District Court

Style: DORENNA BROWN

vs.

WALMART STORES INC, et al

Came to hand on the 31st day of MARCH, 20 22, at 2:00 o'clock P.M. Executed at  
1999 BRYAN ST, #1900, DALLAS, TX 75201, within the County of DALLAS at 3:05 o'clock P.M. on the  
31st day of MARCH, 20 22, by delivering to the within named  
WALMART STORES INC, B/S IT'S R/A, CY CORPORATION SYSTEMS  
THROUGH GEORGE MARTINEZ

each in person, a true copy of this Citation together with the accompanying copy of this pleading, having first endorsed on same date of delivery.

The distance actually traveled by me in serving such process was \_\_\_\_\_ miles and my fees are as follows: To certify which witness my hand.

For serving Citation \$ \_\_\_\_\_

For mileage \$ \_\_\_\_\_

For Notary \$ \_\_\_\_\_

STEVEN J. FRIEDENTHAL

of DEALTON County, TX.

By [Signature] Deputy

18830  
EX 10/31/22

(Must be verified if served outside the State of Texas.)

Signed and sworn to by the said STEVEN J. FRIEDENTHAL before me this 1 day of April, 20 22,  
to certify which witness my hand and seal of office.

Carrie M. Dean

Notary Public

Dallas

County Texas





**Automated Certificate of eService**

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Envelope ID: 63219419

Status as of 4/5/2022 2:14 PM CST

Associated Case Party: DORENNA BROWN

Name	BarNumber	Email	TimestampSubmitted	Status
Shawn Hashemi		efile@chalakilaw.com	4/4/2022 10:25:36 AM	SENT

**FORM NO. 353-3 - CITATION  
THE STATE OF TEXAS**

**To: WAL-MART STORES TEXAS, LLC  
BY SERVING ITS REGISTERED AGENT C T CORPORATION SYSTEM  
1999 BRYAN ST., STE. 900  
DALLAS, TX 75201**

**GREETINGS:**

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **116th District Court** at 600 Commerce Street, Ste. 101, Dallas, Texas 75202.

Said Plaintiff being **DORENNA BROWN**

Filed in said Court **15th day of March, 2022** against

**WALMART STORES, INC., WAL-MART STORES TEXAS, LLC, WAL-MART STORES EAST, LP AND WAL-MART STORES EAST INC.**

For Suit, said suit being numbered **DC-22-02900**, the nature of which demand is as follows:  
Suit on **PROPERTY** etc. as shown on said petition **REQUEST FOR DISCLOSURE**, a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.  
Given under my hand and the Seal of said Court at office this 31st day of March, 2022.

ATTEST: FELICIA PITRE, Clerk of the District Courts of Dallas, County, Texas

By *Carlenia Bouligny*, Deputy  
CARLENIA BOULIGNY



**ESERVE**

**CITATION**

**DC-22-02900**

**DORENNA BROWN  
vs.  
WALMART STORES INC, et al**

**ISSUED THIS  
31st day of March, 2022**

**FELICIA PITRE  
Clerk District Courts,  
Dallas County, Texas**

By: CARLENIA BOULIGNY, Deputy

**Attorney for Plaintiff  
SHAWN S HASHEMI  
CHALAKI LAW PC  
3234 COMMANDER DR  
STE 100  
CARROLLTON TX 75006  
972-793-8500  
efile@chalakilaw.com**

**DALLAS COUNTY  
SERVICE FEES  
NOT PAID**

## OFFICER'S RETURN

Case No. : DC-22-02900

Court No. 116th District Court

Style: DORENNA BROWN

vs.

WALMART STORES INC, et al

Came to hand on the 31ST day of MARCH, 2022, at 2:00 o'clock P.M. Executed at  
1999 BRYAN STREET DALLAS, TX 75201, within the County of DALLAS at 3:05 o'clock P.M. on the  
31ST day of MARCH, 2022, by delivering to the within named  
WAL-MART STORES TEXAS LLC, B/S ITS R/A, CT CORPORATION SYSTEMS,  
THROUGH GEORGE MARTINEZ

each in person, a true copy of this Citation together with the accompanying copy of this pleading, having first endorsed on same date of delivery.

The distance actually traveled by me in serving such process was \_\_\_\_\_ miles and my fees are as follows: To certify which witness my hand.

For serving Citation \$ \_\_\_\_\_

For mileage \$ \_\_\_\_\_

For Notary \$ \_\_\_\_\_

STEVEN J. FRIEDENTHAL

of DENTON County, TX

By [Signature] Deputy

18830

EX 10/13/22

(Must be verified if served outside the State of Texas.)

Signed and sworn to by the said STEVEN J. FRIEDENTHAL before me this 1 day of April, 2022,  
to certify which witness my hand and seal of office.

Carrie M. Dean

Notary Public

Dallas

County TX



**Automated Certificate of eService**

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Envelope ID: 63219090

Status as of 4/5/2022 2:12 PM CST

Associated Case Party: DORENNA BROWN

Name	BarNumber	Email	TimestampSubmitted	Status
Shawn Hashemi		efile@chalakilaw.com	4/4/2022 10:20:59 AM	SENT

**CAUSE NO. DC-22-02900**

<b>DORENNA BROWN</b>	§	<b>IN THE DISTRICT COURT</b>
	§	
<b>VS.</b>	§	<b>DALLAS COUNTY, TEXAS</b>
	§	
<b>WALMART STORES, INC., WAL-MART</b>	§	
<b>STORES TEXAS, LLC, WAL-MART</b>	§	
<b>STORES EAST, LP AND WAL-MART</b>	§	
<b>STORES EAST INC.</b>	§	<b>116<sup>TH</sup> JUDICIAL DISTRICT</b>

**DEFENDANT'S ORIGINAL ANSWER**

**TO THE HONORABLE JUDGE OF SAID COURT:**

**COMES NOW**, Wal-Mart Stores Texas, LLC, Defendant in the above-referenced cause, and files this its Original Answer and respectfully shows the Court the following:

**I.**  
**GENERAL DENIAL**

Defendant generally denies each and every allegation contained in Plaintiff's Original Petition and demands strict proof thereof by preponderance of the credible evidence.

**II.**  
**RULE 193.7 NOTICE**

Pursuant to Texas Rules of Civil Procedure 193.7, Defendant provides notice that it intends to use Plaintiff's production of all documents, tangible things and discovery items produced in response to discovery in any pre-trial proceeding or at trial.

**III.**  
**JURY DEMAND**

Defendant further demands a trial by jury.

**WHEREFORE, PREMISES CONSIDERED**, Defendant prays that Plaintiff take nothing by this suit, that Defendant recover its costs, and for such other and further relief to which Defendant may be justly entitled at law or in equity.

**Respectfully submitted,**

**COBB MARTINEZ WOODWARD PLLC**  
1700 Pacific Avenue, Suite 3100  
Dallas, Texas 75201  
(214) 220-5210  
(214) 220-5299 (Fax)

By: /s/ Stacy Hoffman Bruce

**STACY HOFFMAN BRUCE**

Texas Bar No. 24036793

[sbruce@cobbmartinez.com](mailto:sbruce@cobbmartinez.com)

**ATTORNEYS FOR DEFENDANT  
WAL-MART STORES TEXAS, LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing instrument has been forwarded to the following counsel of record either by telefax, certified mail, return receipt requested, e-mail and/or regular U.S. mail on this 22<sup>nd</sup> day of April, 2022.

Shawn Hashemi  
Chalaki Law, P.C.  
North Dallas Law Center  
3234 Commander Drive, Suite 100  
Carrollton, TX 75006

/s/ Stacy Hoffman Bruce

**STACY HOFFMAN BRUCE**

**Automated Certificate of eService**

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Missy Ramirez on behalf of Stacy Bruce  
Bar No. 24036793  
mramirez@cobbmartinez.com  
Envelope ID: 63821257  
Status as of 4/22/2022 1:38 PM CST

Associated Case Party: DORENNA BROWN

Name	BarNumber	Email	TimestampSubmitted	Status
Shawn Hashemi		efile@chalakilaw.com	4/22/2022 1:12:09 PM	SENT

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Missy Ramirez		mramirez@cobbmartinez.com	4/22/2022 1:12:09 PM	SENT
Stacy H.Bruce		sbruce@cobbmartinez.com	4/22/2022 1:12:09 PM	SENT

**CAUSE NO. DC-22-02900**

<b>DORENNA BROWN</b>	§	<b>IN THE DISTRICT COURT</b>
	§	
<b>VS.</b>	§	<b>DALLAS COUNTY, TEXAS</b>
	§	
<b>WALMART STORES, INC., WAL-MART</b>	§	
<b>STORES TEXAS, LLC, WAL-MART</b>	§	
<b>STORES EAST, LP AND WAL-MART</b>	§	
<b>STORES EAST INC.</b>	§	<b>116<sup>TH</sup> JUDICIAL DISTRICT</b>

**DEFENDANTS' ORIGINAL ANSWER**

**TO THE HONORABLE JUDGE OF SAID COURT:**

**COME NOW**, Walmart Stores, Inc., Wal-Mart Stores East, LP and Wal-Mart Stores East Inc., Defendants in the above-referenced cause, and files this their Original Answer and respectfully show the Court the following:

**I.**  
**GENERAL DENIAL**

Defendants generally deny each and every allegation contained in Plaintiff's Original Petition and demand strict proof thereof by preponderance of the credible evidence.

**II.**  
**RULE 193.7 NOTICE**

Pursuant to Texas Rules of Civil Procedure 193.7, Defendants provide notice that they intend to use Plaintiff's production of all documents, tangible things and discovery items produced in response to discovery in any pre-trial proceeding or at trial.

**III.**  
**JURY DEMAND**

Defendants further demand a trial by jury.

**WHEREFORE, PREMISES CONSIDERED**, Defendants pray that Plaintiff take nothing by this suit, that Defendants recover their costs, and for such other and further relief to which Defendants may be justly entitled at law or in equity.



**Respectfully submitted,**

**COBB MARTINEZ WOODWARD PLLC**

1700 Pacific Avenue, Suite 3100

Dallas, Texas 75201

(214) 220-5210

(214) 220-5299 (Fax)

By: /s/ Stacy Hoffman Bruce

**STACY HOFFMAN BRUCE**

Texas Bar No. 24036793

[sbruce@cobbmartinez.com](mailto:sbruce@cobbmartinez.com)

**ATTORNEYS FOR DEFENDANTS**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing instrument has been forwarded to the following counsel of record either by telefax, certified mail, return receipt requested, e-mail and/or regular U.S. mail on this 22<sup>nd</sup> day of April, 2022.

Shawn Hashemi  
Chalaki Law, P.C.  
North Dallas Law Center  
3234 Commander Drive, Suite 100  
Carrollton, TX 75006

/s/ Stacy Hoffman Bruce

**STACY HOFFMAN BRUCE**

**Automated Certificate of eService**

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Missy Ramirez on behalf of Stacy Bruce  
Bar No. 24036793  
mramirez@cobbmartinez.com  
Envelope ID: 63830524  
Status as of 4/22/2022 3:45 PM CST

Associated Case Party: WAL-MART STORES TEXAS LLC

Name	BarNumber	Email	TimestampSubmitted	Status
Missy Ramirez		mramirez@cobbmartinez.com	4/22/2022 3:16:12 PM	SENT
Stacy H.Bruce		sbruce@cobbmartinez.com	4/22/2022 3:16:12 PM	SENT

Associated Case Party: DORENNA BROWN

Name	BarNumber	Email	TimestampSubmitted	Status
Shawn Hashemi		efile@chalakilaw.com	4/22/2022 3:16:12 PM	SENT